



May 27, 2020

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: IN RE: Actions in Response to COVID-19
Docket No. 2020-106-A; Vote Solar's Summary of May 22, 2020 Written
Comments on Regulatory Options to Mitigate Covid-19 Impacts on Electric
Ratepayers**

Dear Ms. Boyd:

Please find attached for electronic filing the summary of written comments that Vote Solar filed on May 22, 2020 in response to Directive Order No. 2020-372.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely yours,

/s/ Thadeus B. Culley

Thadeus B. Culley
Sr. Regional Director and
Regulatory Counsel
Vote Solar
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(504) 616-0181

cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**DOCKET NO 2020-106-A****Summary of Written Comments of Vote Solar**

My name is Thad Culley and I am Senior Regional Director for the Southeast and Regulatory Counsel for Vote Solar. The purpose of my statement today is to provide a high-level summary of comments that Vote Solar filed in this proceeding on May 22, 2020. Vote Solar realizes the challenges of Covid-19 are pervasive across all essential services and all customer classes. Our comments, however, focus on residential customers of regulated electrical utilities.

Since the onset of the Covid-19 public health emergency, Vote Solar has been advocating for policies to protect customers from disconnection. This is a time of unprecedented economic disruption. Service disconnection moratoria were a noble and necessary first line of defense for affected consumers. However, Vote Solar is deeply concerned that we are on the cusp of an unprecedented crisis of energy affordability and that tens of thousands of households in South Carolina could face disconnection when the status quo disconnection policy returns to force. Given the immediacy of this potential crisis, of our comments begins with five recommendations for near-term and intermediate-term Commission action:

- First, Vote Solar asks the Commission to act now to extend the service disconnection moratorium through at least the end of August 2020;
- Second, we ask that the Commission act now to create a standard grace-period for customers to give customers until at least March of 2021 to catch up on past-due

balances (getting them through the worst weather of both summer and winter seasons);

- Third, we ask that the Commission explore interim policies that could provide for partial or full forgiveness of individual consumer debt. These options could include creative options for customers that receive upfront debt forgiveness as consideration for participating in qualifying energy efficiency or demand-side management programs. This could present win-win opportunities for utilities and indebted consumers and could mitigate the amount of increased bad debt expense that will be socialized to other ratepayers;
- Fourth, we note that any solution must appropriately balance the needs of regulated utilities to maintain financial integrity and consumers to afford essential services. Vote Solar notes that recognizing and capturing any positive cost-saving benefits resulting from system and operational changes during this period will help mitigate and offset any future rate impacts on consumers; and
- Lastly, we ask that the Commission institute a longer-term proceeding to address the structural issues of energy affordability and to standardize procedures to help minimize the deprivation of essential services to consumers during times of financial trauma.

The balance of our comments address in greater depth: (1) the basis of urgency for making these recommendations, (2) the inherent authority of the Commission to pursue these recommendations, and (3) insights and examples of best practices around the country in addressing the problem of customer arrearages and utility cost recovery of incremental costs from the crisis.

Finally, Vote Solar appreciates the opportunity to file its written comments and to provide this summary. This Commission has been proactive in protecting the most vulnerable South Carolinians. We applaud and appreciate your actions. We also wish to thank the Office of Regulatory Staff for showing the leadership to seek broad input on solutions and to ask the Commission to require more detailed reporting of Covid-19 impacts and factors related to changing cost conditions. Indeed, Vote Solar believes that additional reporting of data on customer arrearages and those at risk of disconnection is critical to have a line of sight on the breadth and depth of the problem. Our hope is that the size of this financial crisis diminishes as South Carolina gets back to work. But our five recommendations to the Commission are intended to buy consumers time as the Commission gathers the data it needs to understand the extent of the consumer debt crisis and fashions solutions to this unprecedented situation.

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-106-A, listed below, a copy of the **SUMMARY OF WRITTEN COMMENTS OF VOTE SOLAR** via U.S. Mail or electronic mail on this day, May 27, 2020.

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